

1 NANCY E. PRITIKIN, Bar No. 102392  
2 RONALD D. ARENA, Bar No. 218421  
3 LITTLER MENDELSON  
4 A Professional Corporation  
5 650 California Street, 20th Floor  
6 San Francisco, CA 94108.2693  
7 Telephone: 415.433.1940

8 Attorneys for Defendant  
9 RIGHT MANAGEMENT CONSULTANTS, INC.

10 CHARLES M. LOUDERBACK, Bar No. 88788  
11 JANINE R. HUDSON, Bar No. 206671  
12 THE LOUDERBACK LAW FIRM  
13 One Embarcadero Center, Suite 2300  
14 San Francisco, CA 94111  
15 Telephone: 415.398.7860

16 Attorneys for Plaintiff  
17 MARY JEAN HONG

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

20 MARY JEAN HONG,

21 Plaintiff,

22 v.

23 RIGHT MANAGEMENT  
24 CONSULTANTS, INC., DOES 1 through  
25 100, inclusive,

26 Defendants.

Case No. C04 4011 PJH (EDL)

**DISCOVERY MATTER**

**[PROPOSED] ORDER GRANTING IN  
PART AND DENYING IN PART  
DEFENDANT'S MOTION TO COMPEL  
SUBPOENAS TO PLAINTIFF'S  
TREATING PHYSICIANS AND TO AON  
CORPORATION**

1           **WHEREAS** the parties to the above-captioned action came before the Court on  
2 January 17, 2006, by and through their counsel of record, on Defendant's motion to compel  
3 responses to third party subpoenas. Having reviewed the papers submitted in support of and in  
4 opposition to Defendant's motion, and having heard the argument of counsel,

5           **IT IS HEREBY ORDERED AS FOLLOWS:**

6           Defendant's motion to compel responses to the subpoenas issued to Drs. Steven  
7 Blumlein, Abba Terr, and Hilary Mandel, copies of which are attached hereto as Exhibit A  
8 ("Medical Records Subpoenas") is GRANTED, with the following limitations. All medical records  
9 sought in response to Defendant's Medical Records Subpoenas concerning the following conditions  
10 regarding Mary Jean Hong: stress, anxiety, headaches, stiff neck, rash, skin condition, shoulder  
11 pain, digestive problem, and insomnia shall be produced to counsel for Defendant through counsel  
12 for Plaintiff's offices. In order to assure that counsel for Plaintiff is producing records from the  
13 universe of available records sought in connection with Defendant's Medical Records Subpoenas, at  
14 the time of production, Plaintiff and/or her attorneys shall state, under oath, all steps undertaken in  
15 order to obtain all records responsive to Defendant's Medical Records Subpoenas, and shall attach  
16 all written communications seeking to obtain Defendant's Medical Records Subpoenas. If any  
17 records or information are withheld from production, Plaintiff shall provide a detailed privilege log  
18 that complies with the Court's October 21, 2005 Order regarding Discovery Procedures ("October  
19 21 Order"). This Order is being made without prejudice to Defendant's right to reissue the Medical  
20 Records Subpoenas in the event that Plaintiff does not comply with her obligations set forth herein,  
21 or if Defendant has a reasonable belief that items are missing from Plaintiff's production.

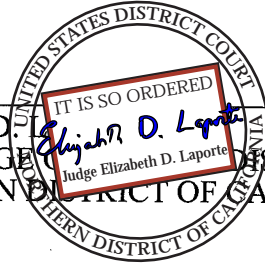
22           Defendant's motion to compel responses to the subpoena issued to Aon Corporation  
23 ("Aon Subpoena") is GRANTED, but only with respect to (1) all documents regarding and reflecting  
24 all forms of compensation Plaintiff received from her employment at Aon, (2) documents reflecting  
25 the date of Plaintiff's termination from Aon Corporation, and (3) documents from Plaintiff's  
26 personnel file reflecting whether her layoff was voluntary or involuntary, and the reasons she was  
27 selected for layoff. Defendant's motion to compel responses to the Aon Subpoena is DENIED with  
28 respect to the remaining documents and categories of records being sought. All records sought in

response to Defendant's Aon Subpoena shall be produced to counsel for Defendant through counsel for Plaintiff's offices. In order to assure that counsel for Plaintiff is producing records from the universe of available records sought in connection with Defendant's Aon Subpoena, at the time of production, Plaintiff and/or her attorneys shall state, under oath, all steps undertaken in order to obtain all records responsive to Defendant's Aon Subpoena, and shall attach all written communications seeking to obtain Defendant's Aon Subpoena. If any records or information are withheld from production, Plaintiff shall provide a detailed privilege log that complies with the Court's October 21 Order. This Order is being made without prejudice to Defendant's right to reissue the Aon Subpoena in the event that Plaintiff does not comply with her obligations set forth herein, or if Defendant has a reasonable belief that items are missing from Plaintiff's production.

**SO ORDERED.**

DATED: January 27, 2006

HON. ELIZABETH D. LAPORTE  
MAGISTRATE JUDGE  
COURT, NORTHERN DISTRICT OF CALIFORNIA



Approved as to form:

DATED: January 27, 2006

By: /s/  
PAUL D. HERBERT  
THE LOUDERBACK LAW FIRM  
Attorneys for Plaintiff  
MARY JEAN HONG

DATED: January 27, 2006

By: /s/  
RONALD D. ARENA  
LITTLER MENDELSON, P.C.  
A Professional Corporation  
Attorneys for Defendant  
RIGHT MANAGEMENT  
CONSULTANTS, INC.

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